



* 1 0 4 9 2 8 8 3 3 4 *

In the District Court of Cleveland County
State of Oklahoma

William L. Harding)
Plaintiff)
vs.)
Oklahoma Dept. of Corrections)
Joseph Harp Furniture Factory)
Anthony Wiechek, Alex)
Lunn, Keith Wells)
Defendant(s))

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }
FILED
Case No. CG-2021-487 (To be entered by Court Clerk)
MAY 20 2021

W In the office of the
Court Clerk MARILYN WILLIAMS

Petition

Comes now the Plaintiff, William L. Harding, and alleges to the Court as follows:

1. The Plaintiff, (full name) William Lee Roy Harding, is an inmate confined in the penal facility located at (mailing address) PO Box 548
Lexington Oklahoma 73051.
2. The Plaintiff is a resident of the State of Oklahoma and has been for 9 years.
3. (a) The Defendant, (name of first defendant) Anthony Wiechek is employed as (position and title, if any) _____ The Defendant's employment address is (mailing address) 3400 MLK Ave
OKC OKla 73111.

At the time the claim(s) alleged in this complaint arose, was this Defendant acting under Color of state law? Yes, or No. If answer is 'yes', briefly explain:

Anthony Wiechek was the top supervisor at Joseph Harp Correction Furniture Factory and held authority over inmates there

3. (b) The Defendant, (name of second defendant) Alex Lunn is employed as (position and title, if any) _____ The Defendant's employment address is (mailing address) 3400 MLK Ave
OKC OKla 73111.

At the time the claim(s) alleged in this complaint arose, was this Defendant acting under color of state law? Yes, or No. If your answer is 'yes', briefly explain:

Alex Lunn was a director over Furniture Factory at Joseph Harp Corr

Exhibit 1

Plaintiffs Petition 01

Section Facetime Factory and has authority over inmates there

Note: Attach additional pages to furnish the information above on each defendant.

See Att.
page 1 of 2

4. Jurisdiction: 42 USC-1981 Employment Discrimination and Equal Pay Act. State and federal Question

5. Venue: Jury

6. Briefly state the facts of the case:

Petitioner was racially discriminated against by the defendants in various ways, he was never paid over time for any hours worked 40 hrs per week and he was retaliated against for filing complaints at the State & Federal Level & ultimately fired as a result.

7. (a) The Plaintiff alleges that the following constitutional rights, privileges or immunities have been violated: (List and designate each count separately).

SF E Attachment Page 00000000

Statement of Claim

pgs 4 of 4 (see Claims)

(b) The following facts support the allegation above: (List and designate each count separately).

See: Equal Employment Opportunity
Commission pages 1 of 7 - 7 of 7

8. I have filed other lawsuits in state or federal court dealing with the same facts involved in this action. Yes, or, No. If the answer is 'yes', describe each lawsuit. (Please attach additional copies of the petition(s) and/or requests for administrative relief).

*Chapter 7 in
West Dist of Okla. Filed at same time*

(a) Parties to the previous lawsuit: Okla. Dept of Corrections, Joseph Harp Furniture Fac.
 Plaintiff(s): Anthony Wiesched, Alex Dunn, Kirk Wells,
 Defendant(s): William C. Harding

(b) Name of court and case number: West District of Oklahoma

(c) Case status: Pending
 Relief granted
 Action dismissed
 On appeal
 Other, please specify:

(d) Issues presented: Same

(e) Date of filing: Same time

(f) Date of Disposition: Open

9. I have sought informal or formal relief from the appropriate administration officials regarding the acts stated in allegation 8 of this Petition. Yes, or, No. If your answer is 'yes', briefly describe how relief was sought and the outcome of the proceedings. If your answer is 'no', briefly explain why administrative relief was not sought.

*See ~~Exhibit~~ Exhibit A pg 1-11
 also Exhibit "B" pg 1-11 3 Bigr*

10. Relief requested: \$2,500,000, plus Punitive

Exhibit 1

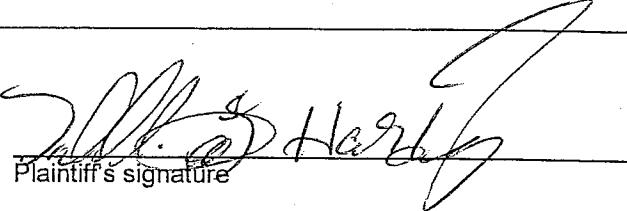
Plaintiffs Petition 03

damages, back over time pay, back pay
forward pay and any other relief that
the court may deem acceptable plus sanctions
to ~~ensure~~ insure that this type of discrimination
ceases in all of Department of Corrections

11. Have you brought any lawsuits in state or federal court within the last ten (10) years? "OCI"

Yes, or No. If your answer is 'yes', a sworn affidavit listing the litigation and the outcome of the litigation must be attached.

12. I am representing myself. Yes, or No. If your answer is 'no', please explain.


Plaintiff's signature

P.O. Box 548
Plaintiff's address

Lexington, OH

SWORN AFFIDAVIT

STATE OF OKLAHOMA)
COUNTY OF CLEVELAND)

I, William L. Harding, residing at Joseph Harp Correctional Center, P.O. Box 548, Lexington, OK 73051-0548, being of lawful age, sound mind and memory and having been duly sworn, hereby depose and state that the following facts are true and correct to the best of my knowledge and belief:

1. I william L. Harding have filed the following law suits in the last 10 years: William L
2. Harding-v-Watch Tower Bible and Tract Society of U.S.
et al Case No. CJ-2020-529; Cleveland Co. Okla; -
3. Still pending. William L. Harding-v-Robot Causase
et al Case No. CI4-15-314-R; Weston Dist of Oklahoma;
4. Dismissed; William L. Harding-v-Officer Stevens,
Joseph Harp Correctional Center Case No. CI4-15-315-R
5. West. Dist of Okla. Dismissed these are the law
suits i remember to the best of my knowledge
6. i do not have all of my records before me

AFFIANT FURTHER SAYETH NAUGHT.

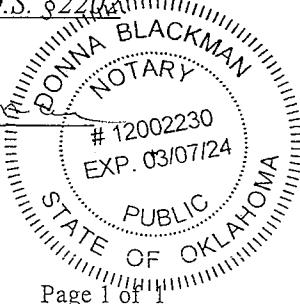
Dated: May 5th 2021

/s/ Donna Blackman

Signature of Affiant

Subscribed and sworn to me, the undersigned Notary Public in and for the County of Cleveland and the State of Oklahoma, by William Harding on this 5 day of May, 2021. The Affiant's identification has been verified by his Oklahoma Dept. of Corrections issued identification card which is capable of accurate determination by source whose accuracy cannot reasonably be questioned. See: 12 O.S. §2203.

/s/ Donna Blackman
Notary Public



Page 1 of 1

Attachment Page 162

3.c. Defendant: Kiehl Wells

16161 Moffat Road

Lexington OK. 73051

Color of State Law: yes

Kiehl Wells is a floor Supervisor at Joseph Harp Furniture Factory and has authority over inmates.

3. d. Defendant: Oklahoma Department of Corrections:

3400 MLK Ave

OKC. OK 73111

Color of State Law: yes

The Department of Corrections is

The corporations that employs

Attorney Wiechec, Alex Lunn, Kiehl Wells

3.e Joseph Harp Furniture Factory

16161 Moffat Road

Lexington OK. 73051

Color of Law: yes

The Joseph Harp Furniture Factory is a incorporated entity owned by Oklahoma Department of Correction

Attachment Pages
that employs inmates by the
hour and as independent contr-
actors and issue W-1099 tax
forms for tax purposes.

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Attachment Page

b7 4

Statement of Claims

No 1: racial discrimination; I was bid off and ultimately fired by Anthony Wiechec and Alex Lunn for speaking up for myself against an accusation for hobby crafting. While being African-American, when others that are white did not suffer the same fate for speaking up for themselves.

No 2: Defamation; On 3-9-2020 in a production meeting Anthony Wiechec defamed & humiliated myself & my character in front of my work peers which were all white other than Alfred Poolaw, which is Native American, demeaning for several minutes with the intent to embarrass, shame & harass me in front of others while Kristen Wells sat there an onlooker.

No 3: Retaliation: After work on

Attachment Page

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3-9-2020, at the security gate i was told by officer Jagures that i was not to come back to work for one week that i was laid in by Anthony Wiesche. This was done in retaliation for me speaking up for myself at the production meeting. On 3-11-2020 I filed a complaint request to Staff No JHCC-12575 and later to the Attorney General and EEOC. The end result was that i was terminated on — 6-15-2020 without ever returning to work.

No 4. No overtime pay: During my entire time working at Joseph Harp Furniture factory i was never paid overtime for the hours worked over 40 hrs per week as required by state and Federal laws. My time sheets will prove this claim.

Attachment Page

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No. 5. Hostile Work environment:

Anthony Wiechec instructed personal of all levels to report to him if they saw anything that they deemed to be extra work, sid jobs, aka-hobby craft. Creating a hostile work environment, because he & Alex Lunn had people doing personal hobby-craft for themselves including myself the petitioner William L. Harding.

Anthony Wiechec favoritism over one nationality over another whim to his advantage

No. 6. Cat Paw Theory: Anthony Wiechec, Alex Lunn & Kelle Wells took under advisement and made personal decisions based off the direction of certain white personal at the furniture factory at Joseph Harp.

Allowing them to dictate whom was hired, what positions they would work & how much they were to be paid.

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At one time i was elected
become Shoppe lead man. After
a day or two of the announce-
ment, Kiehl Wells ask me if i
would allow some else to —
take the position, after a brief
discussion there was an agreement
made, that if i did so, my self
and Wade Edwards would both be
marked out on pay to .65¢ an
hour, which we both were with
in the next week or so.

Afterwards i was told by
other personal, that certain white
personal approach Kiehl Wells,
saying a "black" floor lead was
not what was wanted by them
and others, which the majority
of the furniture factory is white
3 all of the department of —
Correction Furniture factory personnel
is white.

S
Respectfully,
S. D. Hardin

26/2020 To: Equal Employment Opportunity Commission 1 of 7

1. Racial Discrimination

2. Retaliation

3. Violations of:

1. 14th Amend - equal protection

2. 2nd Amend - freedom of speech

3. 1st Amend

4. Defamation

5. Hostile Work environment

6. Cat Paw Theory

I William L. Harding Doc# 234-134

Being Incarcerated at Joseph Harp
Correctional Center in Lexington OKa.

Being employed by Oklahoma
Correction Industries "Furniture Factory"
(Please see Tax Form 1099 enclosed)

On or about March 8th 2020 in
a production Meeting Anthony Wiechec
defamed my character in front of
my work peers all being white except
myself 3 other native American, with
the intent to embarrass 3 slader
my name. Shop Supervisor Keith Wells
was present also, but only put his

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head down & shoot it as if to suggest his disagreement in what was being said & done. Yet Keith Wells refused to do anything to stop Anthony Wiechec.

I then spoke up for myself. Stating that I followed the guide lines put out by Anthony Wiechec. Anthony Wiechec stated that he would talk to me about the issue later. The rest of the work day went by with Anthony Wiechec speaking to me. I believe I clocked out at the end of the day. Officer Jagers told me I was not to come back to work for one week, he further stated: Know the reason why! "I did not"

That day or the next I filed a request to staff that went to Alex Luer. "Copy enclosed" A week later I went back to work at that time Anthony Wiechec told me that I could not come back to work per Alex Luer

Director of "OCI" Oklahoma Correctional Industries because I filed paper work "Request to Staff" & that there was an investigation going on into my allegations against Anthony Wieschec. "Yes: was laid off because Anthony Wieschec & Alex Lunn was being investigated. I have not been allowed to return to work since.

There are at least three other white inmates that have crossed Anthony Wieschec out in front of other inmates & staff with nothing being done to them at all. I was not only laid off but also Anthony Wieschec took 12% of my pay. Which not only double jeopardy but is not part of the OCI policy. In a company meeting after I was not allowed to come back to work ~~After~~ Anthony Wieschec told all the inmate & staff employees that I was laid off because I talked back to him. "I am a man not a slave.

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4 of 8

At some point I spoke with Stephanie Mills and Matt Perry of Interval Affairs through my case manager Debbie Mills, they stated that Anthony Wiechec was being investigated & assured me that they had nothing to do with me being not able to go back to work during their investigation.

The other subject matter has to do with a work bench that I built. Anthony Wiechec claims that it is hobby craft, which I was not. At any rate Anthony Wiechec ask me to make him 6 serving trays & a cutting board for his personal use "gifts to his grand kids" he agreed to pay me one dozen apple fritters from day light donuts. He paid the first dozen but did not pay the rest. Anthony Wiechec and some told certain terminals that

7
56/

Did me in because of the
beach. Anthony Wierchec can not ask
me to hobby craft for him personally
they punish me for the same
thing. I believe Anthony Wierchec
& Aldei Luer has done these
things because a black man
has stood up for his rights. I
am or was the only BLACK
Lead man in the whole factory. I
was at one time elected by
Chris Blaust to take his place as
Floor lead but white inmate con-
vinced Anthony Wierchec & Keith Wells
not to allow me to have the
position, not wanting a "BLACK MAN"
as Ship Floor lead.

As far as the hobby craft &
Anthony Wierchec was approached by
Inmate Joshua Ray to try some
of his hobby craft that he had
built at the Furniture Factory but
nothing at all was done to him
which is a white.

7
6/20

In fact Shirley Wiechec gave
Joshua Ray permission to build plaque
for various groups in which he was
compensated for by said groups. He
Josh. Ray sold ~~by hobby~~ craft to
one of the furniture factory
staff members without any
representatives from Anthony Wiechec.

Stephanie Mills & Matt Perry
interviewed some inmates that
made recorded statement that will
verify my claims. There are others
that will do the same, but I can
request this for fear of more retaliation
against myself & them.

Enclosed are copies of paper work
to show whom was at the production
meeting on March 9th 2020: can
also give you the name of the
three white inmates that cussed
out Anthony Wiechec in the presence
of other inmates & staff

Please return
Stamped SILED
Copy

Respectfully Submitted
William L. Hartley
234-1 Exhibit 1

7 of 7

I can not go around asking for statement because there is a chance that only of other inmate attempting either but also telling Anthony Wiesche what i am doing before i get things S.led, also they may be able to charge me with inciting a riot.

There are other issues about wages once Anthony Wiesche & Alexx Lurel had me work on personal projects that were set for the state or State Agencies they took their agreement the the State & government meeting they should have been pay at least minimum wages according to Irahu set the 25¢ - 60¢ a hour that pay us at the Furthermore they have had me do thousands of dollars worth of work for their personal homes & family members which as i know now is illegal. From serving tray, reloading table to custom Auto seat law chairs at the state expense

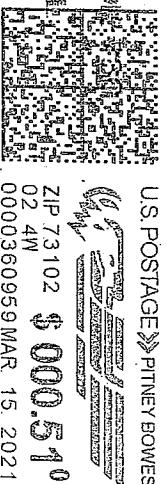
Roset Sathy
William Hally

William Exhibit 1 of 234-1
Plaintiffs Petition 18

OKLAHOMA CITY AREA OFFICE
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
215 DEAN A McGEE AVENUE, SUITE 524
OKLAHOMA CITY, OKLAHOMA 73102
OFFICIAL BUSINESS

Exhibit A

OKLAHOMA CITY



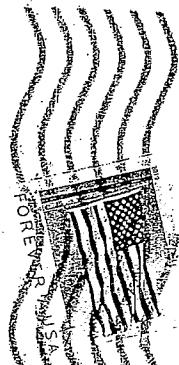
Dismissal of Plaintiff's Petition

16 16

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
OKLAHOMA CITY AREA OFFICE
215 DEAN A MCGEE AVENUE, SUITE 524
OKLAHOMA CITY, OKLAHOMA 73102

OFFICIAL BUSINESS

22 JAN 2021 PM 4 L



Charge of Discrimination

Exhibit A

OKLAHOMA CITY OK 730

Mr. William Harding. Inmate # 234134
P.O. Box 548 JHCC D-1-117
Lexington, OK 73051

Mailed from Det

Pris hlded Mail

2021-05-05

15
26

Exhibit 1
Plaintiffs Petition 20

EXHIBIT A



OFFICE OF CIVIL RIGHTS ENFORCEMENT
EMPLOYMENT
 DISCRIMINATION COMPLAINT

You must complete this Complaint form and the accompanying Intake Questionnaire and return both documents to the address, email or fax number listed below within 180 days of the last incident of employment discrimination, harassment or retaliation. Pursuant to Oklahoma law, a copy of the Complaint will be sent to the employer. The Intake Questionnaire is for OCRE use only and will remain confidential during the investigation. Oklahoma law prohibits employers from engaging in retaliation against individuals who exercise their right to file a complaint.

GENERAL INFORMATION	
YOUR INFORMATION:	EMPLOYER INFORMATION:
Full Name: <i>William L. Harding</i>	Employer Name: <i>Department of Corrections</i> <i>Oklahoma Correctional Industries</i>
Street Address: <i>JHCC-D1-117</i>	Street Address (<u>where you actually worked</u>): <i>Box 548</i>
City, State, Zip Code: <i>Lexington Okla 73051</i>	City, State, Zip Code: <i>Lexington Okla 73051</i>
EMPLOYMENT DISCRIMINATION BASIS	
I have been discriminated against because of my (check all that apply):	
<input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Color <input type="checkbox"/> Religion <input type="checkbox"/> Sex <input type="checkbox"/> Pregnancy <input type="checkbox"/> Age <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input checked="" type="checkbox"/> Genetic Information <input checked="" type="checkbox"/> Retaliation Did the discrimination include unwelcome and/or offensive harassment? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Did the discrimination include sexual harassment? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Date (month, day, and year) when the <u>last</u> incident of discrimination, harassment, or retaliation occurred: <u>3-18-2020</u>	
Full name and job title of each person involved in the discrimination, harassment, or retaliation: <i>Anthony Wiesche, Alex Lunn, Keith Wells</i>	

I swear and affirm that the foregoing information is true to the best of my knowledge, information, and belief.

William L. Harding
 Complainant's Signature

July - 22 - 2020
 Date

OKLAHOMA ATTORNEY GENERAL
 OFFICE OF CIVIL RIGHT ENFORCEMENT

OKLAHOMA CITY OFFICE (Main):
 313 N.E. 21st Street
 Oklahoma City, Oklahoma 73105
 Office (405) 521-3921
 Fax (405) 521-6246

TULSA OFFICE:
 15 W. 6th Street, Suite 1000
 Tulsa, Oklahoma 74119
 Office (918) 581-2342
 Fax (918) 938-6348

EMAIL:
 ocre.complaints@oag.ok.gov



OFFICE OF CIVIL RIGHTS ENFORCEMENT

EMPLOYMENT DISCRIMINATION INTAKE QUESTIONNAIRE

To facilitate the evaluation and investigation of your Complaint, you must answer all of the questions below completely. You may attach additional pages if needed to complete your responses. If you do not know the answer to a question, answer by stating "not known." If a question is not applicable, please write "N/A." PLEASE PRINT CLEARLY.

THIS INTAKE QUESTIONNAIRE WILL NOT BE SENT TO THE EMPLOYER.

1. Additional Personal Information

Phone Numbers: Home: (____) _____ Work: (405) 527-5593 X 8432

Cell: (____) _____ Email Address: VERNON.JONES@DOJ.OK.GOV

Date of Birth: 12-28-64 Sex: Male Female Do You Have a Disability? Yes No

Please answer each of the next three questions. i. Are you Hispanic or Latino? Yes No

ii. What is your Race? Please choose all that apply. American Indian or Alaskan Native Asian White
 Black or African American Native Hawaiian or Other Pacific Islander

iii. What is your National Origin (country of origin or ancestry)? _____

Please Provide The Name Of A Person We Can Contact If We Are Unable To Reach You:

Name: VERNON JONES Relationship: CASE manager II

Address: PO Box 648 City: Lexington State: OK Zip Code: 73051

Home Phone: () _____ Other Phone: 405 527-5593 X 8432

2. I believe that I was discriminated against by the following organization(s): (Check those that apply)

Employer Union Employment Agency Other (Please Specify) _____

Organization Contact Information (If the organization is an employer, provide the address where you actually worked. If you work from home, check here and provide the address of the office to which you reported.) If more than one employer is involved, attach additional sheets.

Organization Name: Oklahoma Correction Industries. "ODOC"

Address: _____ County: Clayton

City: Lexington State: OK Zip: 73051 Phone: () _____

Type of Business: Furniture Fac Job Location if different from Org. Address: Joseph Harp Correction Cen

Human Resources Director or Owner Name: _____ Phone: () _____

Number of Employees in the Organization at All Locations: Please Check (/) One

Fewer Than 15 15 - 100 101 - 200 201 - 500 More than 500

3. Your Employment Data (Complete as many items as you are able.) Are you a federal employee? Yes No

Date Hired: 8-8-17 Job Title At Hire: Hard Wood Chair Lead

Pay Rate When Hired: .30¢@hr. Last or Current Pay Rate: .60¢@hr.

Job Title at Time of Alleged Discrimination: Chair Lead Date Quit/Discharged: 3-9-2020

Name and Title of Immediate Supervisor: Kiesha Wells

If Job Applicant, Date You Applied for Job _____ Job Title Applied For _____

4. What is the reason (basis) for your claim of employment discrimination?

FOR EXAMPLE, if you feel that you were treated worse than someone else because of race, you should check the box next to Race. If you feel you were treated worse for several reasons, such as your sex, religion and national origin, you should check all that apply. If you complained about discrimination, participated in someone else's complaint, or filed a charge of discrimination, and a negative action was threatened or taken, you should check the box next to Retaliation.

Race Religion Sex Pregnancy Age Disability National Origin Retaliation Color (typically a difference in skin shade within the same race). If you checked color, religion or national origin, please specify the color, religion, and/or national origin: _____

Genetic Information—also check the type(s) involved: Genetic Testing Genetic Services Family medical history.

If you checked genetic information, when did the employer receive the genetic information? _____

Other reason (basis) for discrimination (Explain): _____

5. What happened to you that you believe was discriminatory? Include the date(s) of harm, the action(s), and the name(s) and title(s) of the person(s) who you believe discriminated against you. Please attach additional pages if needed.

(Example: 10/02/06 – Discharged by Mr. John Soto, Production Supervisor)

A. Date: 3-9-2020 Action: _____

Name and Title of Person(s) Responsible: Anthony Wreckee

B. Date: _____ Action: Laid off for one week

3 12% of pay taken from my salary to wages

Name and Title of Person(s) Responsible Anthony Wreckee, Industrial Coordinator

6. Why do you believe these actions were discriminatory? Please attach additional pages if needed.

Please attached pages noted 1 of 7

7. What reason(s) were given to you for the acts you consider discriminatory? By whom? His or Her Job Title?

Please see attached pages noted 1 of 7 -
1-7

8. Describe who was in the same situation as you and how they were treated. For example, who else applied for the same job you did, who else had the same attendance record, or who else had the same performance? Provide the race, sex, age, national origin, religion, or disability of these individuals, if known, and if it relates to your claim of discrimination. For example, if your complaint alleges race discrimination, provide the race of each person; if it alleges sex discrimination, provide the sex of each person; and so on. Use additional sheets if needed.

Of the persons in the same situation as you, who was treated better than you?

Full Name	Race, sex, age, national origin, religion or disability	Job Title	Description of Treatment
A. Stacy Montoya White		Office Clerk	110 Actions taken.
B. Marcus Clancy White		Office Clerk	110 Actions taken. See attached pages noted 1 of 7

Of the persons in the same situation as you, who was treated worse than you?

Full Name	Race, sex, age, national origin, religion or disability	Job Title	Description of Treatment
A. Jackie			
B.			

Of the persons in the same situation as you, who was treated the same as you?

Full Name	Race, sex, age, national origin, religion or disability	Job Title	Description of Treatment
A. Odreache Guedane Cajun ^{BIK} Drawor lead laid in due week 12% pay taken demoted to janitor as mr. Guedane did not file a complaint 3 years allowed to return to work with demotion			

Answer questions 9-12 only if you are claiming discrimination based on disability. If not, skip to question 13. Please tell us if you have more than one disability. Please add additional pages if needed.

9. Please check all that apply:

- Yes, I have a disability
- I do not have a disability now but I did have one
- No disability but the organization treats me as if I am disabled

10. What is the disability that you believe is the reason for the adverse action taken against you? Does this disability prevent or limit you from doing anything? (e.g., lifting, sleeping, breathing, walking, caring for yourself, working, etc.).

11. Do you use medications, medical equipment or anything else to lessen or eliminate the symptoms of your disability?

Yes No If "Yes," what medication, medical equipment or other assistance do you use?

12. Did you ask your employer for any changes or assistance to do your job because of your disability? Yes No

If "No," please explain why not: _____

If "Yes," when did you ask? _____ How did you ask (verbally or in writing)? _____

Who did you ask? (Provide full name and job title of person): _____

Describe the changes or assistance that you asked for: _____

How did your employer respond to your request? _____

13. Are there any witnesses to the alleged discriminatory incidents? If yes, please identify them below and tell us what they will say. (Please attach additional pages if needed to complete your response)

Full Name	Job Title	Address & Phone Number	What do you believe this person will tell us?
-----------	-----------	------------------------	---

A. Wade Edwards "Hardwood" Box 548 Lexington OK
Ibel i was discriminated against. Statement enclosed

B. Alfred Nathan "Warehouse Lead" Box 548 Lexington OK
Ibel i did nothing wrong i was discriminated against

C. Lesley Stevens "Order Clerk" Box 548 Lexington OK
"Not Known"

D. Rose Hanley Office Clerk Box 548 Lexington OK
"Not Known," See names on Exhibit A-1, cover sheet
for production meeting

14. What other evidence do you have (check all that apply)? Email Text Messages Notes Audio Recordings
 Video Recordings Journal, Diary, or Calendar Entries Social Media Posts Other (list and describe: _____)

See attached pages 1 of 11

15. Have you filed a charge of discrimination on this matter with the EEOC or another agency? Yes No

16. If you filed a charge or complaint with another agency, provide the name of agency and the date of filing:

EEOC Juile 26 - 2020 mailed to

17. Have you sought help about this situation from a union or any other source? Yes No

Provide name of organization, name of person you spoke with, and date of contact. Results, if any?

See attached pages noted 1 of 11

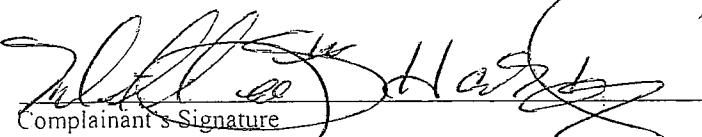
110 results

18. Have you filed a claim for unemployment benefits with the Oklahoma Employment Security Commission?

Yes No

19. Have you retained your own attorney to help you with this matter? Yes No If "Yes," please give the name and contact information:

I swear that the information set forth above is true and correct to the best of my knowledge, information, and belief:


Complainant's Signature

July 22 2020
Date

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: William L. Harding, #234134
 P.O. Box 548
 JHCC D-1-117
 Lexington, OK 73051

From: Oklahoma City Area Office
 215 Dean A. McGee Avenue
 Suite 524
 Oklahoma City, OK 73102



*On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))*

EEOC Charge No.

564-2020-01626

EEOC Representative

James E. Habas,
 Investigator

Telephone No.

(405) 666-0367

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:

- The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.
- Your allegations did not involve a disability as defined by the Americans With Disabilities Act.
- The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.
- Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge
- The EEOC issues the following determination: The EEOC will not proceed further with its investigation, and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.
- The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.
- Other (briefly state) Charge of Discrimination not signed and returned.

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.

On behalf of the Equal Employment Opportunity Commission
ADRIAN MCDANIEL

DN: c=US, o=U.S. Government, ou=Equal Employment
 Opportunity Commission, cn=ADRIAN MCDANIEL
 0.9.2342.19200300.100.1.1=45001002824715
 Date: 2021.03.26 11:23:45 -05'00"

3-26-2021

Enclosures(s)

(Date Issued)

cc:

Samantha Robb
 Employee Rights
 OKLAHOMA DEPARTMENT OF CORRECTIONS
 3400 N. Martin Luther King Blvd
 Oklahoma City, OK 73111

For: Holly Waldron Cole,
 Area Office Director



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

July 22, 2020

Oklahoma Department of Corrections
PO Box 548
Lexington, OK 73051

**Re: William Harding v. Oklahoma Department of Corrections
OCRE Complaint No. CR-20-0095-E
EEOC Charge No. 564-2020-01526**

To Whom It May Concern:

This letter constitutes notice that on July 22, 2020, the Office of Civil Rights Enforcement (“OCRE”) received the enclosed **Employment Discrimination Complaint**.

We have confirmed the Complainant also filed the allegations of discrimination with the U.S. Equal Employment Opportunity Commission (“EEOC”). Since the Complainant also filed with the EEOC, we allow the EEOC to take the lead on the investigation and handle this matter. Our desire is to avoid duplicating investigative efforts and creating unnecessary additional work and expense for all parties involved. In the event the parties resolve this matter, please provide this office with a copy of the Settlement Agreement for our approval.

Please feel free to call me with any questions or concerns you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Kara I. Smith".

Kara I. Smith
Chief Assistant Attorney General
Chief, Office of Civil Rights Enforcement

KIS/bnj

Enclosures: Complaint, Retaliation Notice, Conciliation Notice

cc: William Harding w/enc.

CR-20-0095-E



OFFICE OF CIVIL RIGHTS ENFORCEMENT
EMPLOYMENT
DISCRIMINATION COMPLAINT

RECEIVED

JUL 22 2020

Oklahoma Attorney General
Office of Civil Rights Enforcement

You must complete this Complaint form and the accompanying Intake Questionnaire and return both documents to the address, email or fax number listed below within 180 days of the last incident of employment discrimination, harassment or retaliation. Pursuant to Oklahoma law, a copy of the Complaint will be sent to the employer. The Intake Questionnaire is for OCRE use only and will remain confidential during the investigation. Oklahoma law prohibits employers from engaging in retaliation against individuals who exercise their right to file a complaint.

GENERAL INFORMATION	
YOUR INFORMATION:	EMPLOYER INFORMATION:
Full Name: <i>William tr Harding</i>	Employer Name: <i>Department of Corrections</i> <i>Okl. Correction Industries</i>
Street Address: <i>JHCC-D1-117</i>	Street Address (where you actually worked): <i>Box 548</i>
City, State, Zip Code: <i>Lexington Okla 73051</i>	City, State, Zip Code: <i>Lexington Okla 73051</i>
EMPLOYMENT DISCRIMINATION BASIS	
I have been discriminated against because of my (check all that apply):	
<input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Color <input type="checkbox"/> Religion <input type="checkbox"/> Sex <input type="checkbox"/> Pregnancy <input type="checkbox"/> Age <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input checked="" type="checkbox"/> Genetic Information <input checked="" type="checkbox"/> Retaliation	
Did the discrimination include unwelcome and/or offensive harassment? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Did the discrimination include sexual harassment? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Date (month, day, and year) when the <u>last</u> incident of discrimination, harassment, or retaliation occurred: <i>3-18-2020</i>	
Full name and job title of each person involved in the discrimination, harassment, or retaliation: <i>Anthony Wrenche, Alex Lunn, Keith Wells</i>	

I swear and affirm that the foregoing information is true to the best of my knowledge, information, and belief.

William tr Harding
Complainant's Signature

July - 22 - 2020
Date

OKLAHOMA ATTORNEY GENERAL
OFFICE OF CIVIL RIGHT ENFORCEMENT

OKLAHOMA CITY OFFICE (Main):
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
Office (405) 521-3921
Fax (405) 521-6246

TULSA OFFICE:
15 W. 6th Street, Suite 1000
Tulsa, Oklahoma 74119
Office (918) 581-2342
Fax (918) 938-6348

EMAIL:
ocre.complaints@oag.ok.gov

Exhibit 1 of 17

EXHIBIT B

JHC
Law Library

MAR 11 2020

Must Be Submitted Through the Law Library or Designee

Inmate/Offender Grievance Process

Received

Alex Winn

REQUEST TO STAFF

TO: Mr. Dkt. Andrew HardinFACILITY/UNIT: JHCCDATE: 3-14-20(NAME AND TITLE OF STAFF MEMBER) JHCC 12575I have have not already submitted a "Request to Staff" or grievance on this same issue.If yes, what date: facility: grievance #: I affirm that I do do not have a grievance pending on this issue.I affirm that I do do not have a lawsuit of any type pending that relates in any way to this issue.If a lawsuit is pending, indicate case number and court: This request does does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

I was injured in the for one week for tridling a
desk at OCI FF by Anthony W. which by called
hobby craft. Yet where Anthony W. first started work-
ing as Head of Fungi. fact he had me make a s

(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

OVER

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

To be fully paid for items made for
Anthony W. Placed or receive position of chair
head & paid for all days I did. The rate of
pay for serving 3 cutting boards to be \$0.00 each

NAME: William L. Harding DOC NUMBER: 231134 UNIT & CELL NUMBER: D-1-117

(PRINT)

SIGNATURE: William L. Harding WORK ASSIGNMENT: JHCC - F.F

DO NOT WRITE BELOW THIS LINE

DISPOSITION:

Mr. Harding, you are not allowed to return to work during the investigation of this request. The investigation is currently being handled by OIG. You will be notified of any change.

Alex Winn, Acting Director

03-19-2020

JHCC

STAFF MEMBER

DATE

WARDEN'S OFFICE

MAR 12 2020

Date response sent to inmate/offender: 3-19-20

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

RECEIVED

Exhibit 1

Plaintiffs Petition 30

He started serving trays for his grand children in the holidays. He agreed to pay me 1 dozen Daylight Donuts Apple fritters for each one I board I made him 6 serving trays? I cutting board n which he brought me in 1 dozen Apple fritters from Daylight Donuts. What Anthony W. claimed was hobby craft had been in the shop for over 4 months prior to him saying anything about. Furthermore I could not be taken to the unit to consolidate it as hobby craft. Anthony W. laid me in with out cause and has threatened to reduce my pay by 12% or 54 @ hour. Which if there was cause it would be double jeopardy being punished twice for the same alleged offense. Furthermore, a certain inmate attempted to sell Anthony W. his hobby craft work, yet he was not laid in for that so called offense. I have made "built" custom hobby craft items from reloading tables to Aurora chairs for Alex in OKC headguards. It seems to be that if a hobby craft for there self it is fine. But, if a person does something for themselves it is seen as being which violates the 14th Amendment "equal protection under the law. Other than speaking up for myself when being degraded by ~~Anthony W.~~ Anthony W. is doing wrong. Furthermore Anthony W. would not if did tell me I was laid in but had Sgt. Jaegers tell me on my way out the OCI gate this all occurred on 3-10-20. But the search was noticed by Anthony W. during the last lock down? There was no incident reports.

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process

18

REQUEST TO STAFF

TO: Supervisor of Mail Room FACILITY/UNIT: JHCC-DI-117 DATE: 3-18-22
 (NAME AND TITLE OF STAFF MEMBER) JHCC 126 10

I have X have not already submitted a "Request to Staff" or grievance on same issue.

If yes, what date: 3-18-22 facility: JHCC grievance

I affirm that I do do not have a grievance pending on this issue.

I affirm that I do do not have a lawsuit of any type pending that relates in any to this issue.

If a lawsuit is pending, indicate case number and court:

This request does does not relate to a pending misconduct report. If it does, this request may only be answered by the discipline coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

On 3-18-22 I returned to work (xc 1 F.F) I was informed by Anthony Wiechec that Alex Dunn said I could not return to work because of some issues. I told Keith Wells also stated that I would not be in Hardwood Chair Dept

(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

To be paid 100\$ a day for every day off, to stay as lead in Hardwood Chair Dept to be paid 75\$ per hour, a written apology from Anthony Wiechec, 3 \$50.00 for each piece I made for Anthony Wiechec, which is 7 pieces

NAME: William L. Harding DOC NUMBER: 234-134 UNIT & CELL NUMBER: DI-117

SIGNATURE: William L. Harding WORK ASSIGNMENT: JHCC FF

DO NOT WRITE BELOW THIS LINE

DISPOSITION

Mr. Harding, you are not allowed to return to work during the investigation of this request.

The investigation is currently being handled by OIG. You will be notified of any change.

Alex Dunn, Acting Director 03-19-2020

STAFF MEMBER

DATE

Date response sent to inmate/offender 3-19-22

1. Original to file
2. Copy to inmate/offender

3-19-22
3-19-22

DOC 090124D 4/19/

Case 5:21-cv-00842-JD Document 1-1 Filed 08/25/21 Page 33 of 44

If there is any question about this, I am against
me. Anthony Wicchee is the person that has violated
my Civil Rights with my Ultimatum 3 I amma, Egypt protocol
on 3 freedom of speech. There has been a least two
other incidents where Wicchee office personal has
cursed or raised their voice to Anthony
Wicchee and nothing was done. As stated before
another inmate offered to sell hobby craft work
to Anthony with nothing done. All the above was
done by White inmates. When offenses were
alleged against to African American inmates they
were laid in for 5 days & \$5 per were taken
from their checks. This is a blatant display
& racial prejudice by Anthony Wicchee, which further
shows to me why he has not paid me for the hobby
craft work I did for him has stated in my last request &
staff. Furthermore Alex Lunn has no reason to
refuse my return to work to Hardwood Chair Dept. For
I have designed & custom built several pieces for
A Lunn personal use; a reloading table that is worth
at least \$2,000⁰⁰ us that was sold for less than \$100⁰⁰
in a Arrowdale Chairs in which none are on the show room
floor per (Lancaster Lexington). Anthony Wicchee has, and is,
creating a Hostile work environment, by; Asking inmates to
switch on each other, racial bias, & paddling hairs, in which
he did this last 90 period

5. I am willing to
take a ~~full~~ polygraph
test to prove my case

Respectfully Submitted

John D. Hargan

Exhibit 1 of 11

SCOTT CROW
DIRECTOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF CORRECTIONS
ADMINISTRATIVE REVIEW AUTHORITY

ARA 20-128

Date: APRIL 20, 2020
To: HARDING, WILLIAM #234134
Location: JHCC
From: Mark Knutson, Director's Designee *Mark Knutson*

Your grievance/correspondence was filed improperly for the following reason(s):

<input checked="" type="checkbox"/>	1. No reviewing authority response to the grievance.
<input type="checkbox"/>	2. No informal action, Request to Staff response included.
<input type="checkbox"/>	3. Out of time from date of alleged incident until filing Request to Staff.
<input type="checkbox"/>	4. Out of time from date of response to Request to Staff until filing the grievance with the reviewing authority.
<input type="checkbox"/>	5. Received out of time from date of the reviewing authority's response.
<input type="checkbox"/>	6. You cannot appeal a non-response. See OP-090124 section V.B.1.b.(8) (Request to Staff) or VI.C.4. (grievance).
<input type="checkbox"/>	7. Inmate on grievance restriction and/or proper documentation not included. See OP-090124, section X.B.2.a.
<input type="checkbox"/>	8. Must be legibly written in blue or black ink. No pencil or other color of ink is allowed. No doodling or writing in margins.
<input type="checkbox"/>	9. Attachments to the grievance/appeal (no additional pages allowed except affidavit if required).
<input type="checkbox"/>	10. Not an issue grievable to Oklahoma Department of Corrections (Private prison property, misconduct, litigation pending, not within/under the authority/control of the Department of Corrections)
<input type="checkbox"/>	11. More than one issue or the complaint and relief requested are not consistent on the Request to Staff and grievance.
<input type="checkbox"/>	12. Not of a sensitive nature. You must follow the standard grievance process including giving the reviewing authority an opportunity to respond. Emergency grievances must be submitted to the reviewing authority. See OP-090124, section IX.A.
<input type="checkbox"/>	13. Requests for disciplinary action against staff or monetary compensation will not be addressed in the grievance process.
<input type="checkbox"/>	14. Appeal form not signed/dated.
<input type="checkbox"/>	15. The ruling of the Administrative Review Authority or Director's Designee is final.
<input type="checkbox"/>	16. Facility grievance number not listed on the appeal form.
<input type="checkbox"/>	17. Additional issues submitted in the grievance appeal and not presented in the initial grievance to the reviewing authority for response will not be addressed by this office.
<input type="checkbox"/>	18. You have failed to follow previous instructions from the reviewing authority or ARA for filing this grievance/appeal and/or properly resubmit. YOU ARE NOW OUT OF TIME.
<input type="checkbox"/>	19. You did not provide the date that you received the reviewing authority's response on the appeal form.
<input type="checkbox"/>	20. This grievance is unanswerable as there are no time frames specified for the alleged action(s) to have occurred
<input type="checkbox"/>	21. You failed to identify your grounds for an appeal by checking one, or both boxes on the appeal form.
<input type="checkbox"/>	22. Your appeal must be written on the Misconduct/Grievance Appeal form (DOC060125V effective 4/19).
<input type="checkbox"/>	23. You will be afforded ONE FINAL opportunity to properly resubmit your corrected grievance or appeal which must be received in ARA within ten (10) days of receipt of this form. DO NOT RETURN THIS FORM WITH YOUR CORRECTED APPEAL.
<input checked="" type="checkbox"/>	24. Other: RE: IMPROPERLY SUBMITTED GRIEVANCE FORM. YOU MUST PROPERLY SUBMIT YOUR GRIEVANCE TO THE REVIEWING AUTHORITY AT JHCC, NOT THE DIRECTOR. SEE OP-090124, SECTION VI.B.

THIS OFFICE WILL NOT PROCESS INCOMPLETE/INACCURATE/OUTDATED APPEAL FORMS

NOTE: Abuse of the grievance process as explained in section IX of OP-090124, will result in restrictions being imposed.

I acknowledge receipt of this response: _____

INMATE/OFFENDER GRIEVANCE

JHCC
WARDEN'S OFFICEGrievance no. 20-064

MAY 06 2020

Grievance code: 3

Response due: _____

RECEIVED

DO NOT WRITE ABOVE THIS LINE

Date 4-28-20

Facility or Unit

JHCCName William L. Harding
(Print)

Facility Housing Unit

D1-117DOC Number 234-134

Date "Request to Staff" response received: _____

Have you previously submitted a grievance on this same issue? Yes. If yes, what date 4-1-20, facility Doc. Dir., grievance # ?. You must submit this completed original within 15 days of the receipt of the response to the "Request to Staff". The "Request to Staff" must have been submitted within 7 days of the incident. Do not include/attach anything to this grievance except the "Request to Staff" including the response. You may quote from or make reference to statutes, operations, field, or administrative memoranda, department publications (time sheets, inventory forms, assessments, etc.). You will be permitted only one opportunity to correct any error(s) made in submitting your grievance.

1. The nature of your complaint. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per grievance. Use backside of this page only, if necessary.

On 3-11-18-20 I filed a RTS # JHCC-1257, JHCC 12610 both of the same issue. I was laid off from OCI w. fact for building a work bench. I a claim of raising my voice to Anthony Wiechec. Mr. Wiechec laid me off for once weee took 5-6 our hour from my pay. Please refer to Above RTS for more - I informed that this is an ongoing investigation by OCI, I was questioned by Shirley Mills & Matt Perry
2. Informal action taken (including dates) to resolve the complaint, as well as the names of those employees from whom you sought an answer to your grievance.

None - I informed that this is an ongoing investigation by OCI, I was questioned by Shirley Mills & Matt Perry

3. The action you believe the reviewing authority may lawfully take. To retain job at OCI furniture factory, be paid for all days laid off, paid for work done for Anthony Wiechec @ \$50.00 each total of \$350.00 for 7 hrs - "Sawing trays? Cutting board"

Grievance report sent to (warden/facility head/deputy director//correctional health services administrator):
Reviewing Authority JHCC

Name William L. HardingSignature of Grievant William L. HardingTitle 4-28-20 2nd time

Date Sent to Reviewing Authority

1. Original to file
2. Copy to inmate/offender

DOC 090124A (R 4/19)

SCOTT CROW
DIRECTORJ. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF CORRECTIONS
JOSEPH HARP CORRECTIONAL CENTER

TO: Harding, William DOC 234134
 LOCATION: Joseph Harp Correctional Center
 FROM: Luke Pettigrew, Warden *Luke Pettigrew*
 DATE: May 11, 2020
 RE: Grievance 20-054

A copy of your original grievance correspondence is being returned unanswered for the following reason(s):

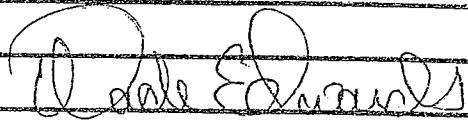
<input checked="" type="checkbox"/>	1. No informal action/Request to Staff response or evidence of submission attached.
<input type="checkbox"/>	2. Out of time from date of incident. RTS must be submitted within (7) calendar days of the incident.
<input type="checkbox"/>	3. Grievances must be submitted (15) calendar days from the date of the receipt of the response to the Request to Staff
<input type="checkbox"/>	4. You are on grievance restriction and/or proper documentation not included.
<input type="checkbox"/>	5. Grievances shall not be submitted about matters that are in the course of litigation.
<input type="checkbox"/>	6. No person may submit a grievance on behalf of another person.
<input type="checkbox"/>	7. Must be legibly written in blue or black ink. No pencil, highlighters or other color of ink is allowed.
<input type="checkbox"/>	8. No additional pages or attachments are allowed. Only the front and back of the form may be used.
<input type="checkbox"/>	9. Grievances shall not be submitted requesting monetary compensation.
<input type="checkbox"/>	10. Grievances shall not be submitted that include requests for disciplinary action against staff.
<input type="checkbox"/>	11. Not of a sensitive/emergency nature. Follow the standard grievance process.
<input type="checkbox"/>	12. Only one issue or incident allowed per grievance form. You have two (2) different issues stated in the grievance and RTS.
<input type="checkbox"/>	13. Grievance not signed/dated or addressed to the appropriate administrator. The "Date sent to Reviewing Authority Was left blank.
<input type="checkbox"/>	14. Additional issues submitted in the grievance and not detailed in the initial Request to Staff
<input type="checkbox"/>	15. Only the current and correct DOC grievance (OP-090124A- Revised 4/2019) and Request to Staff forms will be accepted
<input type="checkbox"/>	16. An issue to which is not grievable by the Oklahoma Department of Corrections.
<input type="checkbox"/>	17. This grievance is unanswerable as there are no time frames specified from the alleged action to have occurred.
<input type="checkbox"/>	18. Original "Offender Grievance Report Form" was not submitted. A new grievance form will need to be resubmitted.
<input type="checkbox"/>	19. You have ten (10) days to resubmit this grievance correctly, if you fail to do so, you will be considered out of time.
<input checked="" type="checkbox"/>	XX 19. Other: Grievance returned unanswered due to matter is currently still pending investigation with OFAI.

Note: All of the information contained herein may be in found in OP-090124. It is your responsibility to properly submit your grievance correspondence to the appropriate staff person in accordance with OP-090124.

Inmate Signature _____ Date _____

Staff Witness Signature _____ Date _____

To whom it may concern
I Wade Edwards was called up to talk
to the internal affairs at the Administration
office at JHCC concerning William Hardin
& I was asked about some things that
Concerned him at OCT Furniture factory.
& I was asked about some hobby craft & items
that MR. Hardin was supposed to make for
Anthony on payment at the Furniture factory
& I never heard any deals being made with
me and several others ate the donuts that
was supposed to be payment for such & items.
& I was also at the production meeting
when our boss really disrespected MR Hardin.
Anthony really got out of hand the way
he approached MR Hardin in front of approx.
15 people. We were just told a couple of workers
prior at another meeting if we had a problem
on the floor go to the floor boss and that's
what MR Hardin did.
Our mail out that same afternoon
the CO at the front desk informed MR Hardin
that he was laid in and will loose
a nuckle in play.


Wade Edwards

6-7-2020

Exhibit 1

Plaintiffs Petition 37

To whom it may concern,

I write this statement based upon my presence only in two aspects, and I will in no way speak disparaging remarks about either party involved. It is my opinion that this could have been resolved with a simple conversation, of which I myself feel partially responsible.

First off, my name is Christopher Blount. I have been the Shop Head at the furniture factory for many years. I am not given any authority over other inmates. I am simply responsible for relaying certain expectations on production, and training/quality assurance.

An incident occurred in which another offender was suspected of "hobby-craft" and said offender was to be laid in for one week. I told said offender that I had no influence upon this decision, but after multiple other inmates informed me that a different offender had made this "hobby-craft" I explained to the staff that another offender was responsible. I refused to inform them of who this offender was. At this point it was agreed that the original offender in question would not be laid in.

As the Shop Head, I failed in my influence. When the party responsible for "hobby-craft" asked me if they should "confess," I told him "NO - LEAVE IT ALONE!" For that, I was wrong, and I believe much of this could have been avoided had I guided with proper judgment. I made that recommendation in error because I felt (my opinion only) that the involved party would be punished regardless. My original primary purpose was to see to it that another

Exhibit 1

Later on we had a sales order discussion in which the issue of the habley craft was broached. Character qualities were challenged, at which point Mr Hardin spoke up and took responsibility. Was he visibly upset? Yes. Did he raise his voice? Not in my opinion. He was told they could discuss the issue after the meeting.

These two factors are the ones I was a direct party to, and in day-to-day business was not out of the ordinary. Anything else would be based upon speculation and gossip. I have much respect for both parties involved, and the only negative opinion I have is the fact that both parties have not resolved this through proper communication, of which I also feel responsible.

Christopher J. Blond #216635

Date\Time: 6/10/2020 9:08:38 AM

ODOC

Institution: JHCC

Offender Statement Report

Offender#	Offender/Group Name	Institution	Unit	Cell/Bed		
0234134	HARDING, WILLIAM	JHCC	D	1-117-BOT		
Transaction List						
Transaction Date	Transaction Type	Source Document #	Receipt#/Check#	Sender Name	Amount	Account Balance
12/01/2019	BEGINNING BALANCE					\$352.72
12/18/2019	OCI PAY	4242204			\$113.80	\$466.52
12/23/2019	SALES	26			(\$54.84)	\$411.68
12/25/2019	JPAY	0000000109930278		GUERRA, EMILIANO	\$50.00	\$461.68
12/27/2019	DISBURSEMENT	GTL	13585308		(\$20.00)	\$441.68
12/27/2019	DISBURSEMENT FEE				(\$0.55)	\$441.13
01/02/2020	GROUP TRANSFER OUT	234134 HG-13			(\$15.90)	\$425.23
01/06/2020	SALES	10			(\$36.25)	\$388.98
01/13/2020	SALES	15			(\$18.88)	\$370.10
01/24/2020	OCI PAY	JHCC JAN 2020 OCI			\$120.85	\$490.95
01/27/2020	SALES	26			(\$74.43)	\$416.52
02/10/2020	SALES	29			(\$24.93)	\$391.59
02/25/2020	OCI PAY	4242204			\$117.45	\$509.04
03/02/2020	SALES	10			(\$70.52)	\$438.52
03/09/2020	GROUP TRANSFER OUT	234134 PJ-014			(\$23.30)	\$415.22
03/13/2020	HOBBY CRAFT	T-18856/SPEARS	83205		\$136.18	\$551.40
03/13/2020	SALES TAX	T-18856/SPEARS			(\$6.18)	\$545.22
03/13/2020	SURCHARGE	T-18856/SPEARS			(\$30.00)	\$515.22
03/16/2020	SALES	14			(\$49.85)	\$465.37
03/19/2020	OCI PAY	4242204			\$55.96	\$521.33
03/23/2020	DISBURSEMENT	PRIME PRODUCTS USA	13593471		(\$11.50)	\$509.83
03/23/2020	DISBURSEMENT FEE				(\$0.55)	\$509.28
03/26/2020	GROUP TRANSFER OUT	234134 H-009			(\$37.35)	\$471.93
03/26/2020	SALES	42			(\$26.90)	\$445.03
03/30/2020	LEGAL COPAY	JHC 3/17/20 ENV			(\$0.10)	\$444.93
03/30/2020	LEGAL COPAY	JHC 3/17/20			(\$1.60)	\$443.33
04/01/2020	GROUP TRANSFER OUT	234134 PHOTOS			(\$7.50)	\$435.83
04/09/2020	SALES	30			(\$10.31)	\$425.52
04/30/2020	GANG PAY	<i>Not OCT</i>			\$14.45	\$439.97
05/04/2020	LEGAL COPAY	ARA 20-128			(\$2.00)	\$437.97
05/13/2020	SALES	82			(\$8.68)	\$429.29
05/13/2020	LEGAL COPAY	JHC 4/13/20 ENV/NOT			(\$1.10)	\$428.19
05/13/2020	LEGAL COPAY	JHC 4/18/20 ENV/PSTG			(\$1.17)	\$427.02
05/21/2020	OCI PAY	4242204			\$15.00	\$442.02
05/21/2020	LEGAL COPAY	JHC 4/18/20 ENV/PSTG			(\$1.33)	\$440.69
05/21/2020	LEGAL COPAY	JHC 4/22/20 NOTARY			(\$1.00)	\$439.69
05/28/2020	LEGAL COPAY	JHC 4/28/20 PSTG			(\$0.50)	\$439.19
06/02/2020	LEGAL COPAY	JHC 5/6/20 PSTG			(\$0.50)	\$438.69
06/03/2020	SALES	24			(\$8.04)	\$430.65

Summary Balances

Available Balance	Savings Balance	Debt Encumbrance	Other Encumbrance	Outstanding Instruments	Administrative Holds	Account Balance
\$0.63	\$430.02	\$0.00	\$0.00	\$0.00	\$0.00	\$430.65

This shows money lost from Exhibit 1 Plaintiffs Petition 40

Numbers for Paupers Affidavit appear in
bold below.

	Deposit	Balance
Dec	\$163.80	\$441.13
Jan	\$120.85	\$416.52
Feb	\$117.45	\$509.04
Mar	\$192.14	\$443.33
Apr	\$14.45	\$439.97
May	\$15.00	\$439.19
Avg	\$ 103.95	\$ 448.20
20%	\$ 20.79	\$ 89.64

Months 6

PAYER'S name, street address, city, state, and ZIP code STATE OF OKLAHOMA DEPARTMENT OF CORRECTIONS PO BOX 11400 OKLAHOMA CITY, OK 73136 - 0400 405-425-2656		1 Rents	OMB No. 1545-0715
		2 Royalties	2019
		3 Other income	1099-MISC
		4 Fed income tax withheld	Income
PAYER'S Federal Tax ID 736017987	RECIPIENT'S identification No. XXXXXX4771	5 Fishing boat proceeds \$ 1036.03	Copy 2
RECIPIENT'S Name and Address HARDING WILLIAM 3400 N MARTIN LUTHER KING AVE OKLAHOMA CITY, OK 73111		6 Med & health care pmts 7 Nonemployee Compensation 8 Pmts in lieu of Div or int	To be filed with recipient's state income tax return, when required.
		9 Payer made direct sales of \$5000 or more of consumer products <input type="checkbox"/>	10 Crop Insurance proceeds 11 12
		13 Excess Golden Par Pmts 16 State tax withheld 17 State/Payer's state no.	14 Gross paid to an attorney 18 State income
Account Number 550		Form 1099-MISC	

Department of the Treasury - Internal Revenue Service

STATE OF OKLAHOMA
DEPARTMENT OF CORRECTIONS
PO BOX 11400
OKLAHOMA CITY, OK 73136-0400

HARDING WILLIAM
3400 N MARTIN LUTHER KING AVE
OKLAHOMA CITY, OK 73111

Important Tax Return Document Enclosed

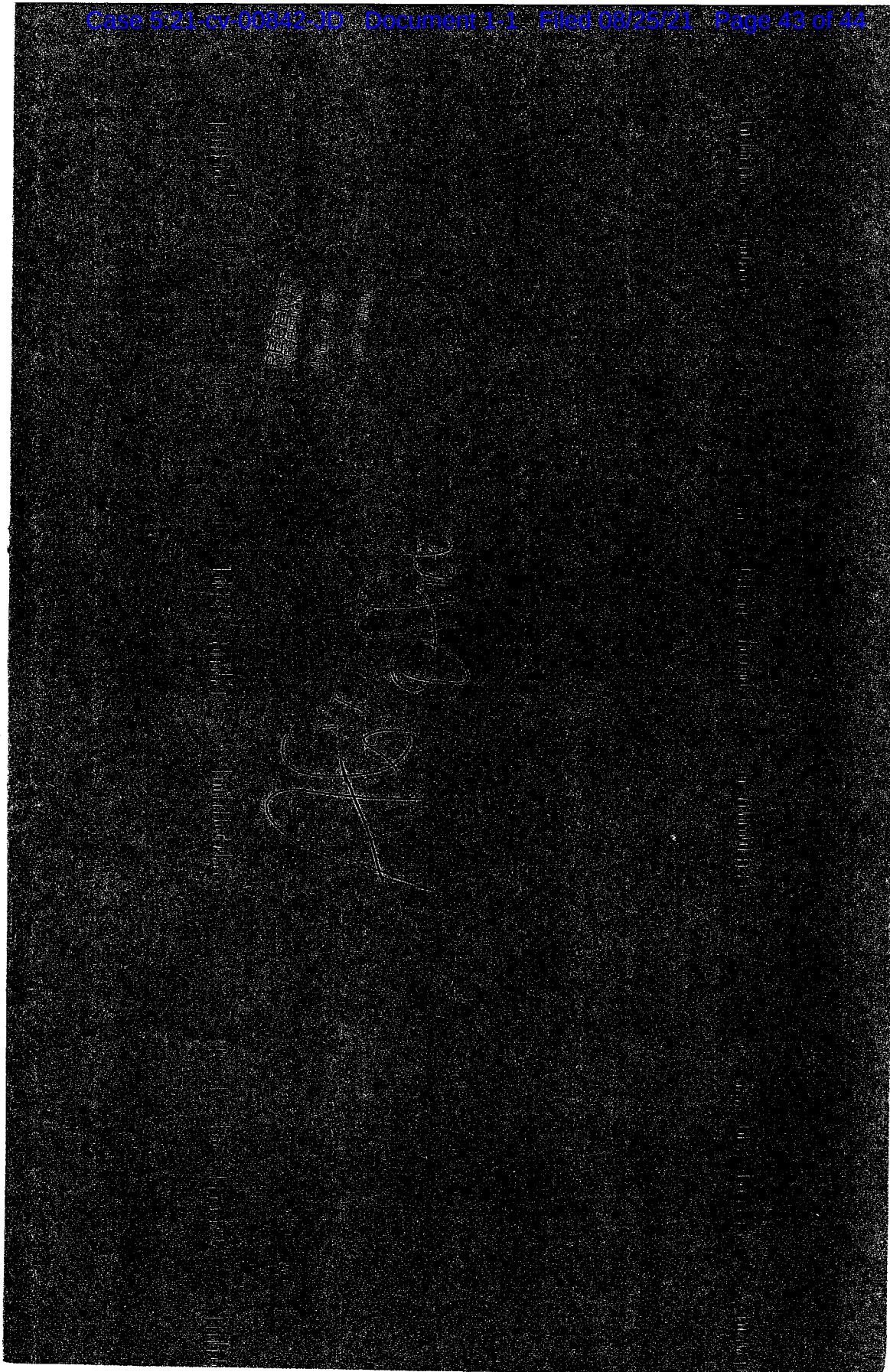
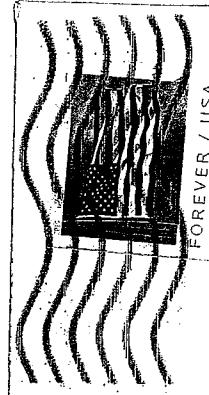


Exhibit 1
Plaintiffs Petition 43



Alex Kuhn
4722 Lynn St
Bartlesville, OK
73044

OKLAHOMA CITY OK 730
17 AUG 2021 PM 5 L

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AUG 19 2021

GENERAL COUNSEL

Office of the general/counsel
Oklahoma Dept of COR
3400 Martin Luther King Ave
OKLAHOMA CITY, OKLAHOMA

73111-429393

73111-429393

Exhibit 1
Plaintiffs Petition 44